
EXHIBIT A

[REDACTED]

MEG KAPLAN, PhD

Curriculum Vitae

Date of Preparation of CV: July 1st, 2019

Field of Study: My field of study is in Human Sexuality. Specifically, my clinical work, research, and teaching focus on the paraphilias, or patterns of atypical sexual behavior and my clinical work has involved sexual dysfunction. This has been my focus for over 35 years. I am the Director of the Sexual Behavior Clinic at New York State Psychiatric Institute. Research conducted at our clinic has demonstrated that most often atypical sexual interest patterns develop during adolescence. Therefore, over the past 28 years I have been researching and treating juveniles who have committed sexual offense, as well as adults, to help these individuals attain sexual health and prevent further victimization. The focus of my research and study has been on how atypical sexual arousal patterns begin, on the age of onset of paraphilias, and on developing effective treatments for this population. A focus of my clinical practice is on sexual dysfunction in men, women, and couples.

Personal data:

Name: Meg Susan Kaplan, PhD

Contact Information:

Work Address: Sexual Behavior Clinic
New York State Psychiatric Institute & Columbia University
Department of Psychiatry, Unit #45
1051 Riverside Drive
New York, N.Y. 10032

(Private Practice)
210 East 68th Street, Suite 1-H
New York, New York 10065 (Private Practice)

Telephone: Cell: 646-338-9708

E-mail: meg.kaplan@nyspi.columbia.edu
msk2@cumc.columbia.edu

Birthplace: New York, New York

Citizenship: United States of America

Academic Appointments:

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7/2019-present	Clinical Professor of Medical Psychology in Psychiatry, College of Physicians and Surgeons, Columbia University, New York, New York
7/1998-Present	Associate Clinical Professor of Psychology (in Psychiatry), College of Physicians and Surgeons, Columbia University, New York, New York
7/1989-6/1998	Assistant Professor of Clinical Psychology (in Psychiatry), College of Physicians and Surgeons, Columbia University, New York, New York
7/1986-6/1989	Instructor of Clinical Psychology (in Psychiatry), College of Physicians and Surgeons, Columbia University, New York, New York

Hospital Appointments:

12/1993-present	Research Scientist III, Washington Heights Community Service (WHCS), Sexual Behavior Clinic, New York, New York
3/1988-12/1993	Research Scientist II, New York State Psychiatric Institute, New York, New York

Present Work Experience:

1990-Present	Director, Sexual Behavior Clinic, New York State Psychiatric institute. This position involved clinical research evaluations and treatment of adult and adolescent sexual abusers, training and supervision of mental health professionals in the evaluation and treatment of sexual offenders.
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Other Work Experience:

2004 to Present	Chairperson, Special Classification Review Board for Sex Offenders (SCRB), Adult Diagnostic & Treatment Center, Department of Corrections, State of New Jersey, Avenel, New Jersey. Under statute 2A:164-8, the Board reviews the treatment progress of incarcerated felons convicted under New Jersey's sex offender act to determine readiness for parole board referral.
1991 to 2004	Member, Special Classification Review Board for Sex Offenders (SCRB), Adult Diagnostic & Treatment Center, Department of Corrections, State of New Jersey, Avenel, New Jersey

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1992-2008	Group Trainer, Columbia University Mental Health Training Project, HIV prevention training for providers to people with severe mental illness
1985-1988	Research Assistant, Research Foundation for Mental Hygiene, Inc. This position involved clinical research with Dr. Gene Abel at the Sexual Behavior Clinic, NYSPI
1974-1984	Parole Officer, New York State Executive Department, New York, New York. This involved the supervision and counseling of offenders of violent felony crimes including investigations and law enforcement.
1981-1984	New York State Division of Parole. This involved the design and implementation of a research study to evaluate the treatment needs for sex offender parolees, the extent of prior treatment in prison, and the evaluation of parolee's sexual interest patterns.
1983	Developed a seven-and-a-half-hour sex education/sex dysfunction treatment course for convicted sex offenders.
1979	Designed and implemented the New York State Division of Parole Lower East Side Project, a community-based project that incorporated community involvement in the social-psychological reintegration of offenders
1977	Designed and conducted Pilot Exchange Program, a one-year experimental program which assigned felony offenders who could most benefit from working with a parole officer of the opposite sex; after one year, the program was made a permanent aspect of the Division of Parole
1973	Counselor, National Council on Alcoholism Alcohol Recovery Institute, New York City, New York, conducted workshops for professionals on alcohol abuse
1971-1973	Research Assistant, Family Institute, New York, New York, research in the development, practice and effectiveness of family therapy

Education:

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7/1980-6/1985 PhD

New York University, New York, New York. Discipline: Human Sexuality: PhD Sponsor: deryck calderwood, Professor (Note: Dr. calderwood requested that his name not be capitalized)

Thesis Title: The Impact of Parolee's Perception of Confidentiality on the Reporting of Their Urges to Interact Sexually with Children

Citation of Publication:

***Kaplan MS**, Abel GG, Rathner J, Mittleman M. The impact of parolee's perceptions of confidentiality on self-reported sex crimes. Annals of Sex Research. 1990;3(3):293-305.

***Kaplan MS.** A description of self-reports of convicted child molesters following incarceration. International Journal of Offender Therapy & Comparative Criminology. 1989;33(1):69-75
Impact factor: 1.452

Annotation-Dr. Kaplan is the senior author on these papers that compare self-reports of past behavior of sex offender parolees to a parole officer with no confidentiality with self-reports to a clinician under conditions of full confidentiality.

9/1970-6/1972 MA

New York University, New York, New York: Discipline: Guidance and Counseling

9/1966-6/1970 BA

New York University, New York, New York; Major: Psychology

Training:

1982-1984

Sexual Behavior Clinic, New York State Psychiatric Institute. Training in the evaluation and treatment of sexual dysfunctions and sexual disorders with Gene Abel MD and Judith Becker PhD

1982-1984

Training as co-therapist with Gene Abel MD in sex dysfunction therapy and the treatment of adult sex offenders at New York State Psychiatric Institute

1970-1973

Counselor, New York State Division of Youth, New York, New York. Individual counseling for juvenile offenders.

1970-1973	Internship as counselor, National Council on Alcoholism, Alcohol Recovery Institute, New York, New York. Conducted workshops for professionals on alcohol abuse
1970-1973	Counselor, New York City Board of Education Peer Group Program, New York, New York. Workshops to train adolescents in peer group and sexuality counseling.
1970-1973	Psychology Intern, Flower Fifth Avenue Medical Center, Mental Retardation Unit, New York, New York. Utilized testing techniques of intelligence and projective tests
1970-1971	Psychology Intern, Beth Israel Hospital, New York, New York. Psychological and perceptual testing of children 4-7 years of age

Explanation of Gaps in Education:

7/1972-1980	Following graduation from New York University with a Master's Degree in Guidance and Counseling in 1972, I decided to gain work experience prior to starting a PhD program and worked at various counseling positions and internships until 1974. I then worked as a New York State Parole Officer from 1974 to 1985, pursuing my PhD in 1980 while employed full time.
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Licensure:

2006-present	Mental Health Counselor, New York State License #5628748
1988-present	Psychologist, New Jersey State License #355100245300

Honors & Awards:

2018	Fellowship in the Association for the Treatment of Sexual Abusers. This is an award given to those members who have demonstrated exceptional commitment and made exceptional contributions to the organization.
12/2/1983	New York State Parole Officers Association Medal of Commendation for the following actions: on 6/30/1983 Meg

Kaplan arrested a violent parole violator who escaped from custody after seriously injuring a fellow parole officer

Professional Organizations and Societies:

Memberships and Positions:

Local:

1999 to 2002	Member, Sex Offender Management Team, Office of the Criminal Justice Coordinator, The City of New York
1998 to 2000	At-Large Member, The Partnership for the Homeless
1984 to 2001	The New York City Task Force Against Sexual Assault

Regional:

1985-present	Member, New York State Association for the Treatment of Sexual Abusers (NYSATSA); Board Member from 1990 to 2016
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National:

1991-present	Member, Association for the Treatment of Sexual Abusers (ATSA); Executive Board member from 1995-2000
1985-present	Member, American Psychological Association
1985-1990	Diplomat, American Board of Sexology
1985-1995	Member, Association in the Advancement of Behavior Therapy (AABT)
1985-2000	Member, Sex Information and Education Council of the United States (SIECUS)
1987-present	Member, Society for Sex therapy and Research (SSTAR)
1985-1995	American Professional Society on the Abuse of Children

International:

1996-present	Member, International Academy of Sex Research
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1985-2010 Member, Society for the Scientific Study of Sex
(SSSS)

Consultative:

2014-present Consultant, Sexual Health and Disorders Committee
of the World Health Organization, making
recommendations for ICD-11

2009-2011 Consultant, Sexual and Gender Identity Disorders
Work Group, DSM-5

2000-present Consultant, Mid-Hudson Forensic Psychiatric Center,
New Hampton, New York. Consulted on the
evaluation and treatment of individuals who have
committed sexual offenses

2002 Consultant, OHEL Children's Home and Family
Services Sex Offender Program: Reviewed Policy,
Procedures and Medical Records

1999-2001 Consultant, New York State Office of Mental Health
Task Force on Sex Abuse

1999-2000 Member, New York City Office of Criminal Justice
Sexual Offender Management Team

1998 Member, New York State Office of Mental Health
Sexually Violent Predator Steering Committee

1995-2005 Expert Consultant, New York State Health Department
Office of Professional Medical Conduct, Albany, New York

Journal Reviewer:

Annals of Sex Research

Criminal Justice and Behavior

Journal of Interpersonal Violence

Journal of Sex Education and Therapy

Sexual Abuse: A Journal of Research & Treatment

Siecus Report

Violence Update

Fellowship and Grant Support:**Past Support:**

2003-2008	Co-Investigator and Prevention Coordinator, HRSA AETC, Columbia University School of Public Health, New York/ New Jersey AIDS Education and Training Center (HRSA) \$104,000 Annually. Provided sexuality and safe sex training to groups that were at high risk for HIV.
2002-2003	Co-Investigator, H4AHA003303, New York State AIDS Institute. Mental Health Training for AIDS Care Providers throughout New York State. \$50,000. Provided sexuality and safe sex training to groups that were at high risk for HIV.
1998-2003	Co-Investigator and Prevention Coordinator, SAMSHA SM52311 Columbia University HIV/AIDS Mental Health Training Project, \$645,00). Provided sexuality and safe sex training to groups that were at high risk for HIV.
1998-2003	Co-Investigator and Prevention Coordinator, SAMSHA SM52311 Columbia University HIV/AIDS Mental Health Training Project, \$645,000. Provided sexuality and safe sex training to groups that were at high risk for HIV.
1995-1998	Co-Investigator and Prevention Coordinator, SAMSHA SM19983 Columbia University HIV/AIDS Mental Health Training Project. \$568,000. Provided sexuality and safe sex training to groups that were at high risk for HIV.
1993-1996	Co-Investigator, NIMH 5P50 MH 43520, HIV Center for Clinical and Behavioral Studies. Determinants of Sexual Problem Behaviors in Childhood. Provided sexuality and safe sex training to groups that were at high risk for HIV.
1992-1995	Co-Investigator and Prevention Coordinator, SAMSHA MH19845 HIV Training for Providers to the Severely Mentally Ill, \$470,000. Provided sexuality and safe sex training to groups that were at high risk for HIV.
1992-1995	Co-Investigator, SAMSHA MH19845 - HIV Training for Providers to The Severely Mentally Ill. Provided sexuality and safe sex training to groups that were at high risk for HIV.
1990	Co-Investigator, BRSG - Characteristics of Female Sexual Offenders Against Children, Pilot Study, \$2,790. Provided sexuality and safe sex training to groups that were at high risk for HIV.

risk for HIV.

1987-1990 Co-Investigator, NIMH -- HIV Center for Clinical and Behavioral Studies: AIDS Prevention for Adolescent Sex Offenders, \$89,794. Provided sexuality and safe sex training to groups that were at high risk for HIV.

Educational Contributions:

Direct Teaching/Precepting/Supervising:

2010-present	Faculty, Columbia-Cornell Forensic Psychiatry Fellowship Program. Delivers 2-hour lectures to forensic fellows five times annually. 2 forensic fellows
1999-present	Faculty, Columbia-Cornell Forensic Psychiatry Fellowship Program. Supervise forensic fellows 2-4 hours per week in group therapy for juveniles who have committed sexual offenses. Supervises intake evaluations and teaches sexual dysfunction evaluation and treatment. 1 forensic fellow weekly throughout the year.
1998-present	One-month clinical elective offered to Columbia and affiliated medical students. This is offered to 1 student at a time and involves 2 to 4 hours of supervision and instruction on the assessment and treatment of juveniles who have committed sexual offenses. Students for the past several years have adopted this elective approximately 4 months out of the year.
1993-2015	Lecture on sexual disorders and sexual dysfunction to the 2 nd year medical student class at Columbia University College of Physicians and Surgeons for 2 hours annually
1994-2005; 2018	Lecture on sexual disorders and sexual dysfunctions to psychiatric residents at Harlem Hospital 2 hours per year; 4 residents
1986-present	Lecture on sexual disorders and sexual dysfunction to psychiatric residents from the Creedmore residency program, 2 hours per year; 4 residents

Advising and Mentorship:

1985-present Instructed and supervised other New York State Office of Mental Health Providers on the assessment and treatment of juveniles who have committed sexual offenses. Most recent mentee is Melissa Peabody, MSW. Approximately 10 hours per year.

Publications:

*denotes first or senior author: *10/36

Peer-Reviewed Research Publications in Print or other Media (annotated):

2018

1. ***Kaplan MS.** Getting Beyond the Sexual Abuse Binary: Discerning Sexual Agency from Sexual Coercion. Sex Positivity in the Time of #MeToo. (2018) The Journal of Contemporary Psychoanalysis. In press.
Impact factor: 0.31
Dr. Kaplan was the only author of this paper, presented at a conference entitled Sex, Power, & Consent: Can We Talk? (2018). She conceived of this subject, which presents the continuum of sexual behaviors and motivation that are relevant to consent, from illegal behaviors to those that are legal but may involve civil violations or ambiguity.

2013

2. Krueger RB, Weiss SL, **Kaplan MS**, Braunstein LJ, Wiener E. The impact of of internet pornography use and cybersexual behavior on child custody and visitation. Journal of Child Custody. 2013 10:68-98.
Impact factor: 0.68
Dr. Kaplan is the 3rd author on this article. She contributed significantly to the conceptualization, research, writing and editing of this manuscript.

2012

3. ***Kaplan MS**, Krueger RB. Cognitive-behavioral treatment of the paraphilias. The Israeli Journal of Psychiatry and Related Sciences. 2012 49(4):291-296.
Impact factor: 1.04
Dr. Kaplan was the primary author of this article, developing the concept, reviewing and writing this manuscript.
4. Krueger RB, **Kaplan MS**. Paraphilic Diagnoses in DSM-5. The Israeli Journal of Psychiatry and Related Sciences. 2012 49(4):248-254.
Impact factor: 1.04
Dr. Kaplan contributed substantially to the conceptualization, writing, and editing of this manuscript.

2010

5. ***Kaplan MS**, Krueger RB. Diagnosis, assessment, and treatment of hypersexuality: Annual Review of Sex Research. Journal of Sex Research. 2010 47(2-3): 181-198.
Impact factor: 2.921
Dr. Kaplan is the first author on this paper, which provided an overview of current knowledge current hypersexuality and its treatment. Dr. Kaplan originated this article and was the main author.

2009

6. Krueger RB, **Kaplan MS**, First M. Sexual and other axis I diagnoses of 60 males arrested for crimes against children involving the internet. CNS Spectrums. 2009 Nov;14(11): 623-631.

Impact factor: 3.504

Dr. Kaplan contributed substantially to the conceptualization, writing, and editing of this manuscript. She was also involved in the clinical treatment of some individuals who agreed to this study.

2002

7. Herman R, **Kaplan MS**, LeMelle S. Psychoeducational debriefings after the September 11 disaster. *Psychiatric Services*. 2002 53 (4): 479

Impact factor: 2.205

Dr. Kaplan contributed substantially to the conceptualization, writing, and editing of this manuscript. She conducted many of the psychoeducational debriefings.

8. Krueger RB, **Kaplan MS**. Treatment resources for the paraphilic and hypersexual disorders. *Journal of Psychiatric Practice*. 2002 Jan;8(1):59-60

Impact factor: 1.722

Dr. Kaplan contributed substantially to the conceptualization, writing, and editing of this manuscript.

9. Krueger RB, **Kaplan MS**: Behavioral and psychopharmacological treatment of the paraphilic and hypersexual disorders. *Journal of Psychiatric Practice*. 2002 Jan; 8(1):21-32

Impact factor: 1.722

Dr. Kaplan cowrote this paper with Dr. Krueger, contributing to the concept, writing, and critically reviewing the article. She was responsible for the section on behavioral treatment.

2001

10. Krueger RB, **Kaplan MS**. The paraphilic and hypersexual disorders: An overview. *Journal of Psychiatric Practice*. 2001 Nov; 7:391-403

Impact factor: 1.722

Dr. Kaplan cowrote this paper with Dr. Krueger, contributing to the concept, writing, and critically reviewing the manuscript.

11. Krueger RB, **Kaplan MS**. Depot-leuprolide acetate for the treatment of the paraphilias: A report of 12 cases. *Archives of Sexual Behavior*. 2001 30:409-422
Impact factor: 3.223 (this is one of the two most influential journals in the field of sexual research)

Dr. Kaplan helped with the conceptualization, writing, and editing of this paper. This was the first published case series involving the use of depot-leuprolide acetate for the treatment of paraphilic disorders.

1997

12. Cournos F, Herman R, **Kaplan MS**, McKinnon K. AIDS prevention for people with severe mental illness. *Journal of Practical Psychiatry and Behavioral Health*. 1997 Sept;3(5):285-293

Impact factor: 2.051

Dr. Kaplan contributed substantially to the conceptualization, writing, and editing of this manuscript. She conducted many of the trainings reported on in this article.

1995

13. Kaemingk K, Koselka M, Becker J, **Kaplan MS**. Age and adolescent sexual offender arousal. *Sexual Abuse: A Journal of Research and Treatment*. 1995 7(4):249-259

Impact factor: 3.444

Dr. Kaplan was a co-author of this paper, contributing to the concept, writing, and editing the manuscript

14. Hunter J, Becker J, Goodwin DW, **Kaplan MS**. The adolescent sexual interest cardsort: Test-retest reliability and concurrent validity in relation to phallometric assessment. *Archives of Sexual Behavior*. 1995 24(5):555-563
Impact factor: 3.223

Dr. Kaplan was a co-author of this paper, contributing to the research, writing, and editing the manuscript.

15. ***Kaplan MS**, Green A. Incarcerated female sexual offenders: A comparison of sexual histories with eleven female nonsexual offenders. *Sexual Abuse: A Journal of Research and Treatment*. 1995 7(4):287-300

Impact factor: 3.444

Dr. Kaplan is the first author on this paper, which compared abuse histories of female sexual offenders with those of females who were not sexual offenders. This was a pioneering paper.

16. Kobayashi J, Sales BD, Becker JV, Figueredo AJ, **Kaplan MS**. Perceived deviance, parent-child bonding, child abuse, and child sexual aggression. *Sexual Abuse: A Journal of Research and Treatment*. 1995 7(1):25-45
Impact factor: 3.444

Dr. Kaplan was a co-author of this paper, contributing to the research, writing, and editing the manuscript.

1994

17. Green A, **Kaplan MS**. Psychiatric impairment and childhood victimization experiences in female child molesters. *Journal of the American Academy of Child and Adolescent Psychiatry*. 1994 Sept;33(7):954-961

Impact factor: 6.250

Dr. Kaplan coauthored this paper. Dr. Kaplan helped in the study design and shared in interviewing the subjects, writing and reviewing this paper.

18. Herman R, **Kaplan MS**, Satriano J, Cournos F, McKinnon K. HIV prevention with people with serious mental illness: Staff training and institutional attitudes. *Psychosocial Rehabilitation Journal*. 1994;17:97-103

Impact factor: N/A

Annotation- N/A

1993

19. ***Kaplan MS**, Morales M, Becker JV. The impact of verbal satiation on adolescent sex offenders: A preliminary report. Journal of Child Sexual Abuse. 1993 2(3):81-88
Impact factor: 1.133
Dr. Kaplan was the first author of this paper; she conceived of the study design, conducted the research and treated and interviewed the subjects.

1992

20. Becker JV, Hunter JA, Goodwin D, **Kaplan MS**, Martinez D. Test-retest reliability of audio-taped phallometric stimuli with adolescent sex offenders. Annals of Sex Research. 1992 5:45-51
Impact factor: 1.78
Dr. Kaplan contributed to the research design and implementation and to the writing and editing of this manuscript.
21. Becker JV, **Kaplan MS**, Tenke CE. The influence of abuse history and denial on erectile response profiles of adolescent sexual perpetrators. Behavior Therapy. 1992 23:87-97
Impact factor: 3.228
Dr. Kaplan contributed to the research design and implementation and to the writing and editing of this manuscript.
22. Becker JV, Stein RM, **Kaplan MS**, Cunningham-Rathner J. Erectile response characteristics of adolescent sex offenders: A preliminary study. Annals of Sex Research. 1992 5(1):81-86
Impact factor: 1.78
Dr. Kaplan contributed to the research design and implementation and to the writing and editing of this manuscript.

1991

23. Hunter JA, Becker JV, **Kaplan MS**, Goodwin DW. The reliability and discriminative utility of the adolescent cognitions scale for juvenile offenders. Annals of Sex Research. 1991 4:281-286
Impact factor: 1.78
Dr. Kaplan contributed to the research design and implementation and to the writing and editing of this manuscript.
24. Becker JV, **Kaplan MS**. Rape victims: Issues, theories and treatment. Annual Review of Sex Research. 1991 2:267-292
Impact factor: 0.80
Dr. Kaplan contributed to conceptualization, research, writing, and editing of this paper.
25. Rotheram-Borus MJ, Becker JV, Koopman C, **Kaplan MS**. AIDS knowledge and beliefs, and sexual behavior of sexually delinquent and non-delinquent (runaway) adolescents. Journal of Adolescence. 1991 14:229-244
Impact factor: 1.865

Dr. Kaplan contributed to the research design, implementation, writing, and editing of this manuscript.

26. ***Kaplan MS**, Becker JV, Tenke CE. Assessment of sexual knowledge and attitudes in an adolescent sex offender population. *Journal of Sex Education and Therapy*. 1991 17(3):217-225

Impact factor: 0.130

Dr. Kaplan developed the conceptualization, research design, and implementation of this study and to the writing and editing of this manuscript.

27. Becker JV, **Kaplan MS**, Tenke CE, Tartaglini A. The Incidence of depressive symptomatology in juvenile sex offenders with a history of abuse. *Child Abuse and Neglect: The International Journal*. 1991 15(3):531-536

Impact factor: 2.899

Dr. Kaplan contributed to the research design, writing, and editing of this manuscript.

28. ***Kaplan MS**, Becker JV, Tenke C. Influence of abuse history on adolescent self-reported comfort with interviewer gender. *Journal of Interpersonal Violence*. 1991 Mar;6(1):3-12

Impact factor: 2.443

Dr. Kaplan contributed to the concept and played a major role in designing and carrying out the study. She interviewed subjects, wrote and reviewed drafts of the paper.

1990

29. ***Kaplan MS**, Becker JV, Martinez D. A comparison of mothers of adolescent incest vs. non-incest perpetrators. *Journal of Family Violence*. 1990 5(3):209-214

Impact factor: 1.025

Dr. Kaplan contributed to the concept and played a major role in designing and carrying out the study. She interviewed subjects, wrote and reviewed drafts of the paper.

30. ***Kaplan MS**, Abel GG, Rathner J, Mittleman M. The impact of parolee's perceptions of confidentiality on self-reported sex crimes. *Annals of Sex Research*. 1990 3(3):293-305.

Impact factor: 1.78

Annotation- N/A

1989

31. Becker JV, Hunter J, Stein R, **Kaplan MS**. Factors associated with erection in adolescent sex offenders. *Journal of Psychopathology & Behavioral Assessment*. 1989 11(4):353-362

Impact factor: 1.792

Dr. Kaplan contributed to the concept and played a major role in designing and carrying out the study. She interviewed the subjects and wrote and reviewed drafts of the paper,

1988

32. ***Kaplan MS**, Becker JV, Cunningham-Rathner J. Characteristics of parents of adolescent incest perpetrators: Preliminary findings. Journal of Family Violence, 1988 3(3): 183-191.
Impact factor: 1.025
Annotation- N/A

33. Kavoussi R, **Kaplan MS**, Becker JV. Psychiatric diagnoses in adolescent sex offenders. Journal of the American Academy of Child and Adolescent Psychiatry. 1988 27(2):241-243
Impact factor: 6.250
Dr. Kaplan was a co-author on this paper, which describes psychiatric diagnoses of juvenile sexual offenders. She participated in developing the concept, and in writing and reviewing the manuscript.

34. Becker JV, **Kaplan MS**, Kavoussi R. Measuring the Effectiveness of Treatment for the Aggressive Adolescent Sexual Offender. Annals of the New York Academy of Science. 1988; 528: 215-222.
Impact factor: 4.277
Dr. Kaplan contributed to the concept, writing and editing of this paper.

1986

35. Becker JV, Cunningham-Rathner J, **Kaplan MS**. Adolescent sexual offenders: demographics, criminal and sexual histories and recommendations for reducing future offenses. Journal of Interpersonal Violence. 1986 Dec;1(4):431-445
Impact factor: 2.443
Dr. Kaplan participated in developing the concept of this research, in writing and reviewing the manuscript.
36. Becker JV, **Kaplan MS**, Cunningham-Rathner J. and Kavouss. RJ. Characteristics of adolescent incest sexual perpetrators: Preliminary findings. Journal of Family Violence. 1986 1(1):85-97
Impact factor: 1.025
Dr. Kaplan was a co-author on this paper, which describes characteristics of juvenile sexual offenders who were incest perpetrators, compared with those who offended with victims who were outside of their families. She participated in developing the research concept, and in writing and reviewing the manuscript.

Other Peer Reviewed Publications in Print or Other Media:

1. Krueger RB, **Kaplan MS**. A Favorable View of the DSM-IV Diagnosis of Pedophilia and Empathy for the Pedophile. Archives of Sexual Behavior. 2002 Dec; 31:486-488

Impact factor: 3.223

This was a requested comment concerning pedophilia

2. Krueger RB, **Kaplan MS**. Disorders of Sexual Impulse Control in Neuropsychiatric Conditions. In T. W. McAllister, Guest Ed. Seminars in Clinical Neuropsychiatry. Pharmacological of Neuropsychiatric Syndromes. 2000 5(4): 266-274
Impact factor: 2.32
This was a requested paper from this journal. Dr. Kaplan contributed extensively regarding behavioral treatment.

Reviews, Chapters, Editorials:

1. Klein V, **Kaplan MS**. Sex Addiction/Hypersexuality in Women (2018) In Balon R, Briken P. (Eds.) Compulsive Sexual Behavior Disorder. Arlington, Virginia: American Psychiatric Publishing in press.
2. Krueger RB, **Kaplan, MS**. Paraphilic Disorders. (2016) In Tasman, A, Kay, J, Lieberman, JA, First, MB, Riba, MB. (Eds.) Psychiatry. Fourth Edition. John Wiley & Sons, Ltd. Hoboken, New Jersey. pp. 1749-1758.
3. Krueger, RB, **Kaplan MS**. Non-Contact Paraphilic Sexual Offenses. (2016) In Hoberman, H, Phoenix, A. (Eds.). Sexual Offending: Predisposing Antecedents, Assessments, & Management. Springer, New York. pp. 79-102.
4. ***Kaplan, MS**, Krueger, RB. "A Review of Human Sexuality and Its Problems (3rd. ed.), Journal of Sex and Marital Therapy. 2010;37(1):72-73.
5. Krueger RB, Wexler R, **Kaplan MS**, Saleh F. (2009) Orchiectomy. (2009) In Saleh, FM, Bradford, Grudzinskas, AJ, Bradford JM, Brodsky DJ. (Eds.). Sex Offenders. Oxford University Press, New York, New York. pp.171-188.
6. Krueger RB, **Kaplan MS**. Frotteurism: Assessment and treatment. (2008) In D. R. Laws and W. O'Donohue (Eds.). Sexual Deviance: Theory, Assessment, and Treatment. 2nd Edition. Guilford Press, New York. pp.150-163.
7. ***Kaplan MS**, Krueger RB. Adolescent Sex Offenders. (2003) In Rosner, R. (Ed.) Principles and Practice of Forensic Psychiatry. Second Edition. Chapter 45, Arnold, London. pp. 455-462.
8. Krueger RB, **Kaplan MS**. A Review of "Clinical Management of Sex Addiction" edited by Patrick J. Carnes and Kenneth M. Adams. New York Brunner Routledge, 2002. Journal of Sex & Marital Therapy October-December 2005 5: 448-450.
9. Herman, R, **Kaplan MS**. Cognitive Behavioral Risk Reduction Groups (Chapter 14) and Training Programs for Staff (Chapter 6). (2002) in Cournos F, Bakalar N, (Eds.) HIV/AIDS and Severe Mental Illness: A Handbook for Mental Health Professionals. Yale University Press, New Haven 2002.

10. Krueger RB, **Kaplan MS**. The Non-Violent Serial Offender: Exhibitionism, Frotteurism, and Telephone Scatologia. (2000) In L.B. Schlesinger (Ed.) Serial Offenders Current Thought, Recent Findings, Unusual Syndromes. CRC Press, Boca Raton, Florida pp.103-118.
11. Krueger RB, **Kaplan MS**. Evaluation and Treatment of Sexual Disorders: Frottage. (2000) In VandeCreek, L. (Ed.) Innovations in Clinical Practice: A Source Book. Professional Resource Press. Sarasota, Fl. Pp.185-198.
12. ***Kaplan MS**, Herman R. Cognitive Behavioral Risk Reduction Groups for People with Mental Illness. (1999) In Cournos F and Bakalar R (Eds.) HIV/AIDS.
13. ***Kaplan MS**, Herman R. Training Programs for Staff in Cournos F, Bakalar R. (Eds.) HIV/AIDS and Severe Mental Illness: A Handbook for Mental Health Professionals. Yale University Press, New Haven.1999.
14. ***Kaplan MS**, Krueger RB. Voyeurism: Psychopathology and Theory. (1997) In Laws DR, and O'Donohue W. (Eds.). Sexual Deviance: Theory, Assessment, and Treatment. Guilford Press. New York. pp. 297-310.
15. Krueger RB, **Kaplan MS**. Frotteurism Assessment and Treatment. (1997) In Laws DR, O'Donohue W. (Eds.) Sexual Deviance: Theory, Assessment, and Treatment. Guilford Press, New York. pp. 131-151.
16. Becker JV, **Kaplan MS**. Sexual Disorders. (1994) In Van Hasselt VB, & Hersen M (Eds.). Advanced Abnormal Psychology. Plenum Publishing Co. New York. 1994.
17. Becker JV, **Kaplan MS**. Cognitive Behavioral Treatment of the Juvenile Sex Offender. H.E. Barbaree, W.L. Marshall, & D.R. Laws, (Eds.). The Juvenile Sexual Offender. Guilford Press, New York. 1993.
18. Becker JV, **Kaplan MS**. Research on Adolescent Sex Offenders. In A. Burgess, (Ed.) Child Trauma I: Issues and Research. Garland Publishing, Inc., New York. 1992; 383-405.
19. ***Kaplan MS**, Becker JV. Adolescent Perpetrators of Incest. R.T. Ammerman and M. Herson, (Eds.) Assessment of Family Violence: A Clinical and Legal Sourcebook. John Wiley and Sons, New York. 1992; 332-347.
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2. Tiefer L, Brick P, **Kaplan MS**. (2003) A New View of Women's Sexual Problems A Teaching Manual.
3. ***Kaplan MS**, Herman R. Training Programs for Staff (1999) in Cournos F, Bakalar R, (Eds.) HIV/AIDS and Severe Mental Illness: A Handbook for Mental Health Professionals. Yale University Press, New Haven.
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1. Krueger RB, **Kaplan MS**. "I Want to Try It. What Else Can I Do?" Chemical Castration as a Treatment for Pedophilia. (2007) R Spitzer, J. Williams, M. First (Eds). DSM-IV-TR Casebook. American Psychiatric Association Press. Washington DC. 2006; pp. 309-334. (translated into Hungarian).

Letters to the Editor:

1. Kraus SW, Krueger RB, Briken P, First MB., Stein DJ, **Kaplan MS**, Voon V, Abdo Carmita, H.N, Grant JE, Atalla E, Reed GM. Compulsive Sexual Behaviour Disorder in ICD-11. World Psychiatry. 2018 Feb;17(1)109-110.

Impact factor: 30.000

Dr. Kaplan consulted with the WHO on the revision of the paraphilic and compulsive sexual behavior diagnoses and contributed to the writing of this letter, which was the first publication to describe this diagnosis in ICD-11

Invited and/or Peer-Selected Presentations at Regional, National or International Levels (partial list drawn from a total of 150 presentations since 1985)

Regional:

1. ***Kaplan, MS.** Atypical Sexual Behavior & Paraphilic Disorders. Invited presentation at NYU/Langone Medical Center for the Department of Psychiatry, New York, New York 2018.
2. ***Kaplan MS,** Krueger RB. The Sexual Behavior Clinic at New York State Psychiatric Institute. Presentation to Behavioral Health Services, Adult and Juvenile Operations, NYC Department of Probation, New York, New York January 2018.
3. Vince M, **Kaplan MS,** Krueger RB. The Adolescent Sexual Offender Program at New York State Psychiatric Institute. Presentation to the New York County Department of Probation, New York, New York 2017.
4. Krueger RB, **Kaplan MS.** The Diagnosis and Treatment of Individuals Who Have Committed Sexual Offenses-Part I-Evaluation. Presentation at Grand Rounds to the Mid-Hudson Forensic Psychiatric Center, New Hampton, New York 2017.
5. Krueger RB, **Kaplan MS.** The Diagnosis and Treatment of Individuals Who Have Committed Sexual Offenses-Part II-Treatment. Presentation at Grand Rounds to the Mid-Hudson Forensic Psychiatric Center, New Hampton, New York 2017.
6. Krueger RB, **Kaplan MS.** Weiss S, Braunstein L. The Impact of Sexual Behavior on Custody Evaluations. Presentation at the Interdisciplinary Forum on Mental Health and Family Law, Phillips-Nizer, New York, New York 2016.
7. Krueger RB, Kaplan MS, Menzie L, Rzewinski J, Kaplan M, Jackson K, Ford W. Program Descriptions on Sex Offender Treatment Panel of Providers. Presentation before the New York County District Attorney's Office, New York, New York 2016.
8. Krueger RB, **Kaplan MS.** The Case of an Individual Arrested for Child Pornography: the U.S. vs. C.R. Presentation at the Tri-State American Academy of Psychiatry and the Law's 15th Annual Conference, San Juan, Puerto Rico 2013.
9. Krueger RB, **Kaplan MS.** Diagnostic Issues in the Assessment and Treatment of Individuals Convicted of Sexual Offenses and an Update on DSM-5. Grand Rounds, Mid-Hudson Forensic Psychiatric Center, New Hampton, New York 2013.

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11. ***Kaplan MS**: Best Practice Intervention Model with Adolescents Who Have Engaged in Inappropriate Sexual Behavior. Workshop given at a conference entitled "Evidence Based and Best Practice Treatment Interventions for Victims of Child Abuse in a Variety of Community Settings" at the New York Fondling Vincent J. Fontana Center for Child Protection, New York, New York 2012.
12. ***Kaplan MS**, Krueger RB. Sexual Acting Out in Adolescents: Normative vs. Pathological Behaviors and Their Management. Presentation at Grand Rounds at Queens Children's Psychiatric Center, Bellerose, New York 2011.
13. ***Kaplan MS**, Krueger RB. Treatment of Individuals with Paraphilias and/or Sexual Disorders. Presentation at Grand Rounds, Lincoln Hospital, Bronx, New York 2011.
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15. Miraglia R, Krueger RB, **Kaplan MS**. The Treatment and Management of Persons Who Have Committed Sexual Offenses, Bureau of Psychiatric Services and Research Institute Support, Statewide Grand Rounds, Albany, New York 2008.
16. ***Kaplan MS**, Weiss S, Braunstein L, Krueger RB. Internet Pornography and Child Custody. Presentation at The Interdisciplinary Forum on Mental Health and the Law, New York, New York 2008.
17. ***Kaplan MS**, Krueger RB. Proposed Paraphilic Diagnoses for DSM-V. Grand Rounds, Mid-Hudson Forensic Psychiatric Center, New Hampton, New York 2009.
18. ***Kaplan MS**. Sex, Drugs, & HIV Prevention: Columbia University HIV/Mental Health Update for Medical Care Providers. New York, NY 2006.
19. ***Kaplan MS**. The Evaluation and Treatment of Sexually Compulsive Behavior. Cornell University School of Medicine, New York, New York 2006.
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28. Krueger RB, **Kaplan MS**. Behavioral and Pharmacologic Treatment of Male Sex Offenders. Statewide Live Televised Grand Rounds, New York Office of Mental Health, Bureau of Psychiatric Services, Albany, New York 2000.
29. Krueger RB, **Kaplan MS**. Offender Dynamics. Presentation for Columbia University's Sexual misconduct Policy Hearing Panelist Training. New York, New York 2000.
30. ***Kaplan MS**, Krueger RB. Adolescent Sex Offenders: An Update. Grand Rounds Presentation at Rockland Children's Psychiatric Center, Rockland, New York 2000.
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37. ***Kaplan MS**. Clinical Assessment of Discharge Readiness for Sexually Abusive Adolescents. Grand Rounds, Rockland Children's Psychiatric Center, Orangeburg, New York 1997.
38. ***Kaplan MS**. Judicial Seminars on Child Sexual Abuse, State of New York, Family Violence Task Force. New York, New York 1996.
39. ***Kaplan MS**. Treatment of Sex Offenders, Grand Rounds, Kirby Forensic Center, New York, New York, October 1996.
40. Cournos F, **Kaplan MS**, Herman R. HIV Infection and Risk Reduction Strategies. Grand Rounds Presentation. Kirby Forensic Psychiatric Center, Ward's Island, New York January 1995.
41. ***Kaplan MS**. HIV/AIDS and People with Serious Mental Illness. Speaker at full-day conferences in conjunction with Columbia University Department of Continuing Medical Education, New York, New York and Albany, New York 1995.
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43. ***Kaplan MS**. Legal and Ethical Dilemmas in Services for Persons with Mental Disabilities: New York State Commission on Quality of Care for the Mentally Disabled Workshop. Albany, New York 1994.
44. ***Kaplan MS**. The Adolescent Sex Offender; Evaluation and Treatment. Mount Sinai Medical Center, Adolescent Health Center, New York, New York 1994.
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9. ***Kaplan MS**. Aids among Women with Severe Mental Illness. American Psychological Association, Women's Health Conference. Washington, D.C. 1996.
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11. ***Kaplan MS**. Adolescent Sex Offenders. United States Department of Justice, National Summit on Promoting Public Safety through the Effective Management of Sex Offenders in the Community. Washington, D.C.1996.
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International:

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EXHIBIT B

Honorable Judge P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

October 2020

Dear Judge Castel,

My big brother is in prison, facing a terrifyingly long prison sentence and here I am, at home in England reflecting on how such a situation even came about. I've worked in prisons, I have a Master of Science Degree (MSc) in Forensic Psychology, I've helped develop programmes to reduce recidivism. But never in a million years did I anticipate this.

So, I guess a bit of background might help. My name is Holly Gabrielle Long (nee. Bright), and I am married with 3 young children (3, 6 and 7). I currently head up a department for an enterprise resource planning (ERP) firm. A few years ago, I left London to move with my husband and children to a small village in South East England. We are from a middle-class family. Peter was sent to an academically amazing private boarding school. He had an unconditional offer from Cambridge University (which he turned down because it wasn't academically taxing enough for him). On the face of it, he had every opportunity and one would expect that he could have, should have been happy and prosperous. But, there's two sides to every story, and his I guess, is no different.

To say that Peter was an unhappy child would be a gross understatement. When we were in primary school, our mum would pick me and my sister up first and then we'd go and get him. Every day, without fail, he would get in the car, upset and angry. I was the outgoing, confident, happy sibling, who was a constant reminder to him of how lonely he was. Making friends was not something that came easily to him and he was bored and frustrated at the lack of academic rigour that his school life provided. Small talk eluded him, and he struggled with how to build any meaningful connections with his peers.

My parents didn't know what to do with him. My father is your stereotypical stiff upper lip Brit. He was sent to boarding school at the age of 6, and never lived at home again. Boarding school, national service, university, marriage. He didn't know what a parent did, and was at best remote as a parent himself. He grew up in an era of corporal punishment and the idea that children should be seen and not heard.

Our mum on the other hand was deeply maternal, but struggling with issues of her own. She never came to terms with the fact that she was adopted, her adoptive father was career army and an alcoholic. My only memory of him was when we were very young and he kicked Peter across the room because he was playing too close to him. Her mother [REDACTED] just after Peter was born and [REDACTED]. Mummy spent the next 6 years caring for her and raising 3 small children with no help from our dad. I don't think he so much as changed a single nappy. Daddy

was made redundant twice when we were kids. He worked all the time setting up his own business and went back into paid employment as soon as he could find work. We hardly saw him, he was always working, and when he wasn't working, he was angry. I don't have any happy family memories from my childhood.

And so mummy started drinking. Drinking wine and smoking at the kitchen table are my prevailing memories of her when we were kids. She was plagued by [REDACTED]. Peter was very much the same, but for her to acknowledge that, to take her desperately unhappy son to get help, would mean admitting to herself that she was in the same boat. So it was ignored. Peter was put in the 'too difficult box', and packed off to boarding school to be someone else's problem, whilst my sister and I stayed at home. I can only imagine how unloved he must have felt. He ran away from school repeatedly, all he wanted was to be at home, to be part of the family, to feel loved. I remember the time he turned up at home just as my mum was putting me in the car to take me to the Doctors and the time the police picked him up, sleeping on a bench in the middle of the night, desperately trying to get home, in sub-zero temperatures. His school suggested family counselling, so clearly evident was the dysfunctionality that persisted at home. We had 1 session. The counsellor asked us all to write down on a piece of paper who in the family thought was the cause of all the arguments. We all wrote down my father, apart from him, who wrote down Peter. It was epically unsuccessful and never repeated.

Peter's love for my parents is huge, and testament to the kindness and forgiveness that he carries in his heart. His upbringing was not one that was marked with love and kindness, rather he was pushed away and his emotional and mental health were neglected. My parents have convinced themselves that they were acting in his best interests. Whilst I love my parents deeply, their behaviour towards him was clearly neglectful of his emotional and mental well being. Our younger sister meanwhile was [REDACTED].

We have a half-brother, David, from my dad's first marriage. He's [REDACTED]. He and my dad didn't speak for a decade (another example of my fathers' poor parenting skills), so we didn't really know him until he came back into our lives after the wider family staged an intervention when I was 19. I also have several cousins on my fathers' side who are also [REDACTED]. We have always been of the belief that Peter is [REDACTED].

I know that Peter is desperately worried about the impact that all of this is having on our elderly father. And he is right to worry, our father is 83 and starting to suffer with the ailments that accompany such an age and we are all concerned that they might never see one another again. To be so far away from Peter whilst all this is going on is heartbreaking. I just want him home, or at least to be able to visit him, so that we can see him. I am hugely grateful that he is able to at least email us. I worry desperately how he will cope with the nuanced interactions of prison life. Tempers flare easily and I fear that this, in combination with the nature of his charges, will lead to him coming to great harm whilst in custody. Were he in the UK, he is someone that would likely be detained on a

Vulnerable Prisoners Unit for his own protection, but I don't believe that such units exist in the USA and so he will have to find a way of adjusting to a mainstream population.

I sat through the first trial (I was, unfortunately not able to make the retrial), and listened to all that was said. Judge Castel, I have worked with sex offenders and been exposed to an underworld of sexuality that is anything but vanilla. To hear in such detail about Peters' sexual proclivities was of course surprising. I do however believe that there is a fundamental difference between the kinks that he openly admits to and the sexual offence that he did not. I was glad to see that the jury gave deep consideration to all that they had heard, and understood the enormity of the challenge before them and why they were unable to reach a unanimous verdict. I was, of course, devastated to learn of the verdict in the second trial.

Behind the highly intelligent, slightly awkward persona that Peter projects, he is an incredibly soft and caring soul. I implore you to consider that Peter has spent 38 years of his life without ever having committed an offence. I cannot help but look at this from my educational background and my own personal experiences with my brother, and I consider/pray that you award him the minimum possible sentence. At heart he is a kind man whom we would all dearly love to welcome back home one day.

I thank you for taking the time to read and consider this.

Yours sincerely,

Holly Long

EXHIBIT C

Honourable Judge P. Kevin Castel,
United States District Judge,
Southern District of New York,
500 Pearl Street,
New York, NY10007

28th September 2020

Dear Judge Castel,

Re: Peter Bright

We are Peter's parents, Myra and Tim Bright. We are English and live in South London. We have been married for 41 years. We have three children: Peter is the eldest and he has two sisters. Tim is 83 and retired. I am 63 and a private cook, but the outbreak of Covid 19 has brought my business to a stop. On the plus side it has given us the opportunity to see more of our five grandchildren. Family is very important to us.

Peter was born 6 weeks prematurely but despite his small size he was soon home and grew as expected. He passed all the usual baby milestones (sitting up, crawling) but had a very limited vocabulary and didn't start talking until he was 3 years old. As a young boy he would spend hours playing with Lego with great concentration and creativity. He was a smart child who was always in his own world, and he spent a lot of time alone. At four years old he attended a local school, but it became clear that he was not intellectually stimulated enough, and we were able to move him to another school where he was given encouragement to stretch himself academically. Peter flourished at his new school. He excelled at Maths, Chemistry and Physics and was always willing to help others in the class if they asked him. His teachers remarked he was kind and patient when helping others in a subject he was confident with.

At his secondary school, Peter enjoyed the lessons but found interaction with adults and his peers difficult. He didn't make friends easily and I did my best to invite friends for tea so that he could play. His sisters regularly asked friends to the house or were asked to go to their houses. It used to make me so sad that he seldom got invited back to his friends' houses. Looking back, I can see that Peter was depressed during his adolescent years and beyond. His isolation in his room at the top of the house always worried me. Of course, with hindsight I should have tried to get him some counselling but in those days depression wasn't as talked about as a problem in the young as it is nowadays.

When he was 13 we sent him to a very academic boarding school, Winchester College. Peter did not want to go and during the first term he ran away and turned up at our home one afternoon. We took him back, but he wasn't happy during this time and I think he felt jealous of his sisters being at home all the time and going to day school in London. With hindsight I

believe now that it would have been better if we had sent him to a day school where he would not have been isolated from his family.

During his time at secondary school it became apparent that Peter reacted differently to others – no eye contact, not good at small talk except with people who had similar interests, e.g. Maths and Computers. Around this time Peter's half-brother (17 years older) was [REDACTED]. Other nephews and nieces in the family have also been [REDACTED]. The more we researched this the more certain we were that Peter [REDACTED].

[REDACTED] Peter found it difficult to form close friendships with his peers as he didn't understand why people did not see things as he did. As a result of this he was depressed and began to see a counsellor at school.

Peter gained a place at Imperial College, London to study Mechanical Engineering. But as a result of his very academic secondary school, he found he was just repeating work already done, so he left and got himself a job as a developer with a software company which he enjoyed as it was using his skills.

Peter hit a low point emotionally in May 2018 and saw a psychiatrist who prescribed anti-depressants for him. It took him a while for him to tell us but once he did, we could talk about mental health issues freely. He said that the medication and counselling sessions were helping him a lot. When he came over to England in January 2019 for his sister's wedding, we all saw such a change in him. He was much more relaxed, more interested in talking to others and joining in. We were so happy that he, at last, was obviously feeling good about himself.

One of Peter's defining characteristics is that he is a kind-hearted person who cares deeply about others. He hates injustice and will argue for the less able members of Society. Homelessness upsets him and he will often stop to talk to those living on the streets. He also loves animals and is sincerely passionate about social issues.

Peter's arrest was devastating for us. As a close family we are finding the situation terribly hard to comprehend. It feels like a black cloud pushing down on us. Peter has told me both in person and email that he is worried about the impact this is having on all of us, particularly his father, Tim, who is 83 years old. He and Peter worry hugely that they won't see each other again – a dreadful prospect.

I visited Peter every month since his arrest in May 2019 up until the Covid 19 lockdown. I attended both his trials and I was aghast at the verdict of the second jury. Peter was open and honest about his alternative, but always consensual, lifestyle. While his choices may not have been that of the average Joe, it in no way equates to the charges brought. My heart aches for him. I continue to stand by my son and believe that he is not the kind of person who could do what he was accused and convicted of. It's not our Peter.

Judge Castel, Peter has been detained in a horrific place. The conditions at MCC are deplorable at the best of times. In addition to the unsanitary conditions and rodent and vermin infestation, now because of Covid 19, prisoners are locked up 22.5 hours a day. They are deprived of much needed physical contact with loved ones. I haven't seen my son in 7 months. It breaks my heart not being able to hug him—I know he counts on his family's love and support to keep him afloat and it just pains us to be so far apart.

I urge you please, to grant Peter the lowest sentence possible and therefore give him the opportunity to pick up the pieces of his life at the earliest time possible.

Yours sincerely,

Myra & Tim Bright

A large black rectangular redaction box covering the signature area, likely obscuring the names of the signatories.

EXHIBIT D

Honorable Judge P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street New York, NY 10007

September 2020

Dear Judge Castel:

RE: PETER BRIGHT

My name is Primrose Hollis (née Bright) and I am the youngest sister of Peter Bright. I am 34 years old, living in London with my husband, son, and young baby. I work as a Personal Assistant and my husband is a Firefighter.

Growing up with Peter was often challenging, as he was never what you could describe as a 'normal' child. Peter was obviously highly intelligent, which was apparent from a young age, but it was clear he didn't have the same social interaction skills that both myself and my sister Holly had. I think he found it hard to form friendships and make meaningful connections with others. Our mother tried to help him with friendships e.g. with play dates, but this was often hard work for all. Peter's difficulty in processing his emotions tended to manifest itself in the form of anger or frustration, usually directed at his nearest and dearest. My parents tried to handle him by encouraging his academic side, and he was sent away to a highly academic boarding school with the hope that this would bring out the best in him and also to have someone else deal with him. It was so clear that Peter found this a traumatic experience – he ran away a number of times, to be picked up by the police and returned back to school. Peter later told us (when he was about 35) that he was horrifically bullied at school and found it incredibly difficult.

Peter's clear unhappiness and distress during his teenage years was not well managed by my parents. My father (who is 83) is pretty hard-line when it comes to parenting – the adage that children should be seen and not heard sums up his view on nurturing. He saw Peter as a troublesome child to be punished and sent away, rather than looking to see the reasons for his behaviour. My mother was incredibly loving but was, and is, an extremely troubled woman who self-medicated with alcohol until she finally sought professional help when she was in her 60's. She was a (mostly) functioning alcoholic and her and my father led isolated lives – my father would return from work and sit in front of the television, and my mother would sit in the kitchen, chain smoking and drinking into oblivion. Looking back, our home was not a happy one, but a home filled with anger and sadness.

Growing up, we all assumed that Peter [REDACTED], but neither of my parents took any form of action to try and assist with this or obtain a proper diagnosis. His obvious depression was never considered, which was confusing as [REDACTED]. How Peter must have felt about this disparity in parenting I do not know, but I imagine he felt deeply isolated and neglected.

When Peter left school at 18, he went to University in London, but did not last long (perhaps two semesters), claiming that he found that the lectures were too simple and not intellectually stimulating enough. I think also, he found living away from home very challenging, as he did not fit into the normal student, sociable stereotype. When returning home, he started working for one of my friend's fathers in computers and seemed to do well.

Peter led a relatively hermit-like lifestyle – coming home from work and then sitting in front of his computer and playing games and forming friendships via the internet. He found the internet as a lifeline – a way to talk with like minded people without having to socialise. Occasionally (perhaps 3-4 times a year), he would meet up with his internet friends and appeared to have fun. I was living at home as well on and off during my time at University, and I was so happy that he seemed to have found a feeling of belonging at last. He made his first trips to the United States for meet ups and I remember him saying how happy he felt in the US, as it was somewhere where he could be himself. But aside from these rare trips, his life was in either work or his bedroom at his computer. It seemed so isolated.

After his move to the US, I saw Peter about once a year (usually at Christmas, and in January 2019 for my wedding). His communication was scant at times, which is often difficult, because not knowing how he is can be hard. But he would reach out when it matters – when my son was taken to hospital at 8 weeks, when my appendix burst, on birthdays etc. When I told him last April about my beloved cat going missing, he was so caring and concerned. Sometimes I think Peter protects himself in his bubble of isolation to avoid feeling more pain and hurt – because when he does feel something he feels it so much deeper than your average person. When he started to see a therapist a couple of years ago, he finally opened up about his depression and that it was something that hasn't ever lifted for him, and that he had dealt with it forever – but he just thought it was how everyone felt, that it was just a part of life. They put him on Wellbutrin which enabled him to gain some clarity that being depressed isn't normal. Around that time my mother [REDACTED] and said to Peter that 'I know you've been struggling a long time' – Peter was upset by this as he couldn't understand why she had never once mentioned this to him before and tried to help him. How as a parent you can ignore your child's clear mental distress and not help is something I will never be able to understand.

Since his arrest and incarceration, Peter and I are in daily email exchange, and I have managed to travel out once to visit him at MCC in October 2019. Our conversations are mostly trivial, as we generally try to avoid discussing the reality of this truly awful situation. How prison has not broken him I do not know, and I am in constant disbelief as to how he has found the inner strength to keep going. Being unable to travel to either trials was heart-breaking (I was heavily pregnant at the time), and not being there to not only support Peter, but my poor mother also, is something that will haunt me for the rest of my life. My mother is still so traumatised by the second trial and has struggled to function since that day. I have a constant worry that she will have a nervous breakdown – or worse.

The nightmare of the situation has been made even worse by Covid 19. Being unable to travel to see him since the trial is awful and I worry that following his sentencing he will be sent to a prison even further away for us, so that even once transatlantic travel resumes, he will still be unreachable. His time in prison has been made all the worse by the Covid lockdowns where he has been locked in his cell for 23 hours a day on his own – this type of punishment is horrifically severe. With this in mind, I ask you please to consider the minimum sentence possible for Peter, my dear brother, so that he can at least try and maintain the hope that he can rebuild his life following his eventual release.

Thank you for taking the time to read this.

Yours sincerely,

Primrose Hollis